

**FEDERAL PUBLIC DEFENDER OFFICE  
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October 4, 2021

**VIA EMAIL**

Assistant U.S. Attorney David Tobin  
U.S. Attorney's Office  
One Courthouse Way, Suite 9200  
Boston, MA 02210

**RE: United States v. Wallace Lima  
No. 21-cr-10227-DJC**

Dear Attorney Tobin:

I have reviewed the discovery you provided on September 7, 2021, and am writing to request the following additional items of discovery in accordance with Local Rule 116.3(a).

1. Subpoena issued to Comcast and records produced by Comcast as referenced on page 4 of SA Back's search warrant affidavit. Fed.R.Crim.P. 16(a)(1)(E).
2. Photographs taken during the execution of the search warrant at Mr. Lima's residence on December 16, 2020 and referenced in USAO\_0010-0011. Fed.R.Crim.P. 16(a)(1)(E).
3. Copy of information obtained by law enforcement of other people residing in apartment that was subject of search warrant and reference on page 8 of SA Back's search warrant affidavit. *Brady v. Maryland*, 373 U.S. 83 (1963); Local Rule 116.2(b)(1)(A).
4. Any statements made by other people present in the apartment at the time of the search warrant execution on December 16, 2020 (names listed on USAO\_10). *Brady v. Maryland*, 373 U.S. 83 (1963); Local Rule 116.2(b)(1)(A).
5. Any recording of Mr. Lima's interrogation by agents described in USAO\_0008-0009. Fed.R.Crim.P. 16(a)(1)(B)(i).

6. Any notes taken by agents at the time of their interrogation of Mr. Lima described in USAO\_0008-0009. Fed.R.Crim.P. 16(a)(1)(B)(ii).
7. Whether or not Mr. Lima was administered a polygraph examination, as referenced in USAO\_0009, and, if so, the results of such examination, recording of such examination, and statements made by Mr. Lima in the course of such examination. Fed.R.Crim.P. 16(a)(1)(A); Fed.R.Crim.P. 16(a)(1)(B)(i); Fed.R.Crim.P. 16(a)(1)(F); *Brady v. Maryland*, 373 U.S. 83 (1963); Local Rule 116.2(a)(4) and Local Rule 116.2(b)(4).

Please note that the defendant may file additional discovery requests based on further discovery and investigation.

If you have any questions regarding these requests, please contact me at (617) 223-8061 or jane\_peachy@fd.org. Thank you for your cooperation in this matter.

Sincerely,

/s/ Jane Peachy

Jane Peachy,

Assistant Federal Public Defender

cc: Clerk's Office, United States District Court (via ECF)  
Walace Lima